



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

September 23, 2005

Certified Mail No. 7005 0390 0003 2967 8748

Alan Hieb
Plant Manager
The Amalgamated Sugar Company
Box 700
Paul, ID 83347

RE: Facility ID No. 067-00001, TASC0, MiniCassia Facility
Final Tier I Operating Permit

Dear Mr. Hieb:

The Idaho Department of Environmental Quality (DEQ) is issuing revised Tier I Operating Permit No. T1-030416 to The Amalgamated Sugar Company (TASCO) for its MiniCassia facility in Paul in accordance with IDAPA 58.01.01.300 through 397, Rules for the Control of Air Pollution in Idaho (Rules). This facility was among the first one-third of the facilities in Idaho to be issued Tier I operating permits and was, therefore, given an initial three year permit term. However, the initial permit was appealed immediately after issuance. A settlement agreement was signed by DEQ and TASCO on February 14, 2004, which dismissed the appeal. TASCO has requested that the expiration date, which did not change as a result of the revisions agreed upon in the settlement agreement, be extended by one year, to December 12, 2006. The permit subject to the appeal was issued December 12, 2002. The requested one-year extension falls within the allowable permit duration described by IDAPA 58.01.01.322.13, therefore, the extension is allowed. This permit replaces Tier I Operating Permit No. 067-00001, issued December 12, 2002, the terms and conditions of which shall no longer apply.

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units.

Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the Rules.

A representative of the Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Bauer for:", is written over the typed name.

Martin Bauer, Administrator
Air Quality Division

MB/BR/sd

Permit No. T1-030416

Enclosure

G:\Air Quality\Stationary Source\SS Ltd\T1\TASCO - MiniCassia\T1-030416\Final\T1-030416 Final PL.doc

c: Steve VanZandt, Twin Falls Regional Office
Bill Rogers, Permit Coordinator
Marilyn Seymore/Pat Rayne, Air Quality Division
Laurie Kral, EPA Region 10
Permit Binder
Source File
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)



**Air Quality
TIER I OPERATING PERMIT
State of Idaho
Department of Environmental
Quality**

PERMIT No.: T1-030416
FACILITY ID No.: 067-00001
AQCR: 063 **CLASS:** A
SIC: 2063 **ZONE:** 12
UTM COORDINATE (km): 274.0, 4721.0

1. PERMITTEE

The Amalgamated Sugar Company LLC - MiniCassia Facility

2. PROJECT

Tier I Operating Permit Administrative Amendment

3. MAILING ADDRESS

Box 700

CITY

Paul

**STATE
ID**

**ZIP
83347**

4. FACILITY CONTACT

Alan Hieb

TITLE

Plant Manager

TELEPHONE

(208) 438-2115

5. RESPONSIBLE OFFICIAL

Alan Hieb

TITLE

Plant Manager

TELEPHONE

(208) 438-2115

6. EXACT PLANT LOCATION

50 South 500 West, Paul, Idaho

COUNTY

Minidoka

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Beet-sugar manufacturing

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 - 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

This Tier I operating permit replaces Tier I Operating Permit No. 067-00001, issued December 12, 2002, the terms and conditions of which shall no longer apply. The effective date of this permit is the date of signature by DEQ on this cover page.

NOT FOR REPRODUCTION

TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: September 23, 2005

DATE EXPIRES: December 12, 2006

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu/lb	British thermal units per pound
CAA	Clean Air Act
CaO	calcium oxide
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grains (7,000 grains = 1 pound)
gr/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
mg/l	milligrams per liter
MMBtu/hr	million British thermal units per hour
NO _x	oxides of nitrogen
NSPS	New Source Performance Standards
O ₂	oxygen
O&M	operations and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppmvd	parts per million by volume on a dry basis
psig	pounds per square inch gauge
PTC	permit to construct
PW	process weight
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
TASCO	The Amalgamated Sugar Company
T/hr	tons per hour
TDS	total dissolved solids
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-030416

Permittee:	TASCO	Facility ID No. 067-00001	Date Issued:	September 23, 2005
Location:	MiniCassia Facility		Date Expires:	December 12, 2006

1. FACILITY-WIDE CONDITIONS

Table 1.1 summarizes the facility-wide requirements that generally apply to emissions units at the facility.

Table 1.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.1	Fugitive emissions	Reasonable control	IDAPA 58.01.01.650-651	1.2, 1.3, 1.4, 1.11
1.5	Odors	Reasonable control	IDAPA 58.01.01.775-776	1.6, 1.11
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11
1.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	1.9-1.9.5, 1.11
1.12	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	1.11
1.13	Renovation or demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	1.11
1.14	Chemical accidental release	Compliance with 40 CFR 68	40 CFR 68	1.11
1.15	Air quality standards	EPA reference test methods	IDAPA 58.01.01.157	1.11, 1.20
1.16	Coal sulfur content limit	No greater than 1% by weight	IDAPA 58.01.01.729	1.11, 1.17
1.18, 1.19	Fuel-burning equipment	Compliance with IDAPA 58.01.01.676-677	IDAPA 58.01.01.676-677	1.11
1.20	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	1.11, 1.15
1.21	O&M Manuals	Development and maintenance	IDAPA 58.01.01.322.06; Permit No. 13-1480-0001	1.11

Fugitive Emissions

- 1.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]
- 1.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

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- 1.3 The permittee shall maintain records of all fugitive emissions complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 1.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions are present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Odors

- 1.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
[IDAPA 58.01.01.775-776, 5/1/94]
- 1.6 The permittee shall maintain records of all odor complaints received. If a complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Visible Emissions

- 1.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gases are the only reason(s) for the failure of the emission to comply with the requirements of this section.
[IDAPA 58.01.01.625, 4/5/00]
- 1.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions that are not covered by Permit Conditions 2.6, 3.7, and 4.6 during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each monthly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the

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date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Excess Emissions

- 1.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 1.9 and the regulations of IDAPA 58.01.01.130-136.
- 1.9.1 The person responsible for, or in charge of, a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions events, to reduce the frequency of occurrence of such events, and to minimize the amount by which the emission standard is exceeded. In addition, this person shall, as provided below or upon request of DEQ, submit a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken.
[IDAPA 58.01.01.132, 4/5/00]
- 1.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emissions unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to the following:
[IDAPA 58.01.01.133, 4/5/00]
- Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory has been declared by DEQ.
[IDAPA 58.01.01.133.01.a, 3/20/97]
 - Notifying DEQ of an excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the excess emissions event unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advanced notice was necessary.
[IDAPA 58.01.01.133.01.b, 4/5/00]
 - Reporting and recording the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.
[IDAPA 58.01.01.133.01.c, 3/20/97]
- 1.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:
[IDAPA 58.01.01.134, 4/5/00]

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- 1.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures that cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
[IDAPA 58.01.01.134.02.a, 4/5/00]
- The owner or operator shall notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
[IDAPA 58.01.01.134.02.b, 4/5/00]
- The owner or operator shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

- 1.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the excess emissions until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03, 4/5/00]

- 1.9.4 The owner or operator shall submit a written report for each excess emissions event to DEQ no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 3/20/97; IDAPA 58.01.01.135.02, 4/5/00]

- 1.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to DEQ upon request. The excess emissions records shall include the information required by IDAPA 58.01.01.136.03(a) and (b), as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

- An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

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- Copies of all startup, shutdown, and scheduled maintenance procedures and upset/breakdown/ safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

Reports and Certifications

- 1.10 All periodic reports and certifications required by this permit shall be submitted to DEQ within 45 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. The annual reporting period for the permittee starts on September 1 of each year and ends on August 31 of the next calendar year. The semiannual reporting periods for the permittee will be September 1 through February 28 (or 29 in a leap year) and March 1 through August 31. Reports, certifications, and notifications shall be submitted to:

Department of Environmental Quality
Twin Falls Regional Office
Air Quality Permit Compliance
601 Pole Line Rd., Suite 2
Twin Falls, Idaho 83301
Tel.: (208) 736-2190

Fax: (208) 736-2194

The periodic compliance certification required by permit General Provision 14.21 shall also be submitted within 45 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Avenue
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 4/5/00; IDAPA 58.01.01.322.11, 4/6/05]

Monitoring and Recordkeeping

- 1.11 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

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Open Burning

- 1.12 The facility shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 3/21/03]

Renovation and Demolition

- 1.13 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 1.14 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions in 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10(a)]

Test Methods

- 1.15 If testing is required, the permittee shall use the test methods listed in Table 1.2 to measure the pollutant emissions.

Table 1.2 EPA REFERENCE TEST METHODS

Pollutants	Test Methods*	Special Conditions
PM	EPA Method 5	
	EPA Method 5B for B&W Coal-fired Boiler and Erie City Boiler while fired by coal only	
PM ₁₀	EPA Method 201.a. and EPA Method 202	
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	Sources subject to NSPS use IDAPA 58.01.01.625 and Method 9; otherwise, use IDAPA 58.01.01.625 only.

* Or approved alternative in accordance with IDAPA 58.01.01.157

Sulfur Content

- 1.16 No person shall sell, distribute, use, or make available for use any coal containing greater than 1% sulfur by weight.

[IDAPA 58.01.01.729, 5/1/94; Permit Condition]

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- 1.17 The permittee shall maintain documentation of the actual sulfur content in percent by weight for each shipment of coal received. The documentation must identify the supplier of the coal, the date of delivery, and the coal sulfur content in percent by weight.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Fuel-burning Equipment

- 1.18 No person shall discharge to the atmosphere from any fuel-burning equipment with a maximum rated input of 10 MMBtu/hr or more, and commencing operation on or after October 1, 1979, PM in excess of the concentrations shown in the following table:

Table 1.3 GRAIN-LOADING STANDARDS FOR NEW SOURCES

Fuel Type	Allowable Particulate (gr/dscf)	Oxygen
Gas	.015	3%
Liquid	.050	3%
Coal	.050	8%
Wood Product	.080	8%

The effluent gas volume shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.676, 5/1/94]

- 1.19 A person shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of the concentrations shown in Table 1.4.

Table 1.4 GRAIN-LOADING STANDARDS FOR MINOR AND EXISTING SOURCES

Fuel Type	Allowable Particulate (gr/dscf)	Oxygen
Gas	.015	3%
Liquid	.050	3%
Coal	.100	8%
Wood Product	.200	8%

The effluent gas volume shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.677, 5/1/94]

Compliance Testing

- 1.20 The permittee shall provide a notice of intent to test to DEQ at least 15 days prior to the scheduled test unless a shorter time period has been provided in a permit, order, or consent decree, or the permittee has prior DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

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- The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Within 30 days following the date on which a compliance test required by this permit is concluded, the permittee shall submit to DEQ a compliance test report for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to:

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office
601 Pole Line Rd., Suite 2
Twin Falls, ID 83301

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Operations and Maintenance Manual Requirements

- 1.21 The permittee shall develop an O&M manual for the appropriate emissions control device(s) for each of the following sources: (a) the B&W boiler; (b) the Erie City boiler; (c) the pulp dryers; (d) the pellet coolers; (e) the lime kilns; (f) the flume and process slakers; (g) the drying granulator; (h) the cooling granulators; (i) the sugar handling systems, (h) lime kiln building material handling system. The permittee shall develop each O&M manual within 18 months of issuance of this permit.
- 1.21.1 After the initial O&M manual development, the permittee shall update the control device monitoring program in the O&M manuals as necessary after each DEQ-approved performance test.
- 1.21.2 The O&M manuals shall address the operation, maintenance, and repair of applicable control device(s) for each source to ensure good working order and operation as efficiently as practicable. The manuals shall include, at a minimum, a general description of the control device(s); normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective action procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities for a period of five years, in accordance with Permit Condition 1.11.
- 1.21.3 The O&M manuals shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges where applicable, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, any specific control device monitoring parameter(s) required under any permit condition in this permit, unless DEQ approves their removal from this permit condition. The control device monitoring program shall be developed by the permittee based on performance test results, vendor data, and/or other supporting documentation.

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- 1.21.4 The O&M manual shall be maintained onsite and shall be made available to DEQ representatives upon request.
- 1.21.5 Whenever an operating parameter is outside the operating range specified by the control device monitoring program in an O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards, unless DEQ determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required.

[IDAPA 58.01.01.322.06, 5/1/94; Permit Condition]

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2. B&W COAL-FIRED BOILER (P-B1)

The following is a narrative description of the B&W coal-fired boiler, identified as emission point P-B1, regulated in this Tier I operating permit. This description is for informational purposes only.

The B&W boiler has a rated steam production capacity of 200,000 pounds of steam per hour. The boiler is a coal-fired stoker boiler, which produces 200 psi, 500°F, super-heated steam for power production and evaporation water for sugar beet juices. The B&W boiler, in conjunction with the Erie City boiler, provides steam for electricity and for sugar production processes in the main mill.

Table 2.1 describes the devices used to control emissions from the B&W coal-fired boiler.

Table 2.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point Identification	Emissions Unit(s)/ Process(es)	Emissions Control Device(s)
P-B1	B&W coal-fired boiler	One multiclone (A - B1A) and one spray-chamber scrubber (A - B1B) in series

Table 2.2 contains a summary of requirements that apply generally to the B&W boiler. Specific permit requirements are listed below Table 2.2.

Table 2.2 APPLICABLE REQUIREMENTS SUMMARY FOR B&W BOILER

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
2.1	PM	0.100 gr/dscf at 8% O ₂	IDAPA 58.01.01.677; Permit No. 13-1020-0001-00	2.5, 2.8, 2.9, 2.10, 2.11
2.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; Permit No. 13-1020-0001-00	2.7

Table 2.3 contains a summary of requirements that apply to the B&W boiler's spray-chamber scrubber.

Table 2.3 APPLICABLE REQUIREMENTS SUMMARY FOR B&W BOILER CONTROL DEVICES

Control Device	Operating Parameter	Operating Range	Monitoring and Recordkeeping Requirements
Spray-chamber scrubber	Water flow	460 to 690 gpm	2.8, 2.9, 2.10, 2.11
	TDS and suspended particulate	57,900 mg/l	

Permit Limits/Operating Requirements

- 2.1 A person shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of 0.100 gr/dscf corrected to 8% oxygen.

[Permit Condition81]

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- 2.2 The permittee shall comply with the visible emissions requirements listed in Permit Condition 1.7.
[Permit Condition]
- 2.3 The permittee shall operate the scrubber within the specified operating range for each operating parameter specified below.
- The water flow rate to the scrubber shall be maintained within the range of 460 to 690 gpm.
 - The concentration of suspended particulate and total dissolved solids (TDS) in the recirculated water shall not exceed 57,900 mg/l of water.
- [IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]**
- 2.4 The permittee shall, at all times, maintain and operate the multiclone and scrubber in accordance with the O&M manual, or as efficiently as practicable. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- [IDAPA 58.01.01.322.01 (state-only), 3/19/99]**

Compliance Testing

- 2.5 A compliance test shall be conducted within the first 12 months of this permit term to demonstrate compliance with Permit Condition 2.1. Testing shall be conducted in accordance with IDAPA 58.01.01.157, Permit Condition 1.20, and the following:
- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5B, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157. Test methods and procedures shall comply with IDAPA 58.01.01.157.
 - Prior to conducting the test, the permittee shall address the required averaging period specified in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.
 - A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
 - The permittee shall monitor and record the steam production rate of the boiler, coal feed rate in tons per hour, pressure drop across the multiclone, and water flow rate to the scrubber during each test.
 - For the coal used during the source test, the permittee shall record the coal's highest heating value and coal's analysis result, including ash content.
 - If the PM measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 2.1, no further testing shall be required during this term of the permit. If the PM measured during the initial compliance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 2.1, a second test shall be required in the third year of the permit term. If the PM measured during the initial compliance test is greater than 90% of the emission standard in Permit Condition 2.1, the permittee shall conduct a compliance test annually.

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- The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of suspended particulate and TDS of the sample recirculated water shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.
- The permittee shall record and maintain the information required under Permit Condition 2.5 in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 09, 5/1/94;
IDAPA 58.01.01.322.08, 4/5/00]

- 2.6 The permittee may conduct additional compliance tests during the permit term to revise the operational parameters in Permit Condition 2.3 and/or parameters developed under Permit Conditions 2.5, so long as the compliance tests conform to all requirements of this permit.

[IDAPA 58.01.01.322.01, 3/19/99]

Monitoring and Recordkeeping

- 2.7 The permittee shall conduct weekly visible emissions inspections during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for the boiler stack. If any visible emissions are present, the permittee shall perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

- During a week that a compliance test required by Permit Condition 2.5 is scheduled, the weekly visible emissions evaluation shall be performed during the compliance test. Results of the visible emissions evaluation shall be submitted with the compliance test report.
- If four consecutive weekly visible emissions inspections indicate that visible emissions are not present, or opacity is below 20%, respectively, the frequency of visible emissions inspections decreases to monthly. If any monthly Method 9 observation indicates opacity is greater than 20%, the frequency of the visible emissions inspections reverts to weekly.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

- 2.8 The permittee shall install, operate, calibrate, and maintain monitoring devices to continuously measure the scrubber water flow rate. The flow rate shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event the monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94;
IDAPA 58.01.01.322.08, 4/5/00]

- 2.9 At least once each year during a planned maintenance outage, or as needed during operation, the multiclone and the spray-chamber scrubber shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the multiclone and the scrubbers to ensure efficient operation.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

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- 2.10 The permittee shall collect a representative sample of recirculated water from the scrubber monthly from September to December and biweekly from January to the end of the campaign. The concentration of suspended particulate and TDS in the sample recirculated water shall be analyzed and recorded.
[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94;
IDAPA 58.01.01.322.08, 4/5/00]
- 2.11 All the records shall be recorded and maintained in accordance with Permit Condition 1.11. The permittee shall record the starting and ending dates of each campaign.
[IDAPA 58.01.01.322.06, 07, 5/1/94]

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3. ERIE CITY BOILER (P-B2A AND P-B2B)

The following is a narrative description of the Erie City boiler, identified as emission point S-B2, regulated in this Tier I operating permit. This description is for informational purposes only.

The Erie City boiler has a rated steam production capacity of 200,000 pounds of steam per hour when fired with coal and 250,000 pounds of steam per hour when fired with natural gas. The Erie City boiler is a coal pulverized/natural gas, horizontally-fired boiler that produces 400 psi, 600°F, super-heated steam for power production and evaporation water for sugar beet juices.

Table 3.1 describes the control devices used to control emissions from the Erie City boiler.

Table 3.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point Identification	Emissions Unit(s)/ Process(es)	Emissions Unit(s)/ Process(es)	Emission Control Device
P-B2A	200,000 pounds steam per hour boiler when fired with coal	Boiler (S-B2) while fired with coal, or the combination of coal and natural gas	One multiclone (A - B2A) and one spray-chamber (A - B2B) scrubber in series
P-B2B	250,000 pounds steam per hour boiler when fired with natural gas	Boiler (S-B2) while fired by natural gas only	Multiclone (A - B2A)

Table 3.2 contains a summary of requirements that apply generally to the Erie City boiler. Specific permit requirements are listed below Table 3.2.

Table 3.2 APPLICABLE REQUIREMENTS SUMMARY FOR EMISSIONS UNIT

Permit Conditions	Affected Emission Point	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
3.1	<u>P-B2A</u> (while the boiler is fired with coal, or the combination of coal and natural gas)	PM	0.100* X + 0.011 *Y at 8% O ₂	IDAPA 58.01.01.677-678; Permit No. 13-1020-0001-00	3.2, 3.4, 3.6, 3.9, 3.10, 3.11
	<u>P-B2B</u> (while the boiler is fired by natural gas only)	PM	0.015 gr/dscf at 3% O ₂	IDAPA 58.01.01.677	3.2, 3.4, 3.6
3.3	P-B2A and P-B2B	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; Permit No. 13-1020-0001-00	3.8

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Table 3.3 contains a summary of requirements that apply to Erie City boiler's multiclone and spray-chamber scrubber. Specific permit requirements are listed below.

Table 3.3 APPLICABLE REQUIREMENTS SUMMARY FOR EMISSIONS CONTROL DEVICES

Control Device	Operating Parameter	Operating Range	Monitoring
Spray-chamber scrubber	Water flow	660 to 990 gpm	3.9, 3.10, 3.11
	TDS and suspended particulate	57,900 mg/l	

Permit Limits/Operating Requirements

- 3.1 A person shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of the concentrations shown in Table 3.4. The effluent gas volume shall be corrected to the oxygen concentration shown.

Table 3.4 FUEL-BURNING EQUIPMENT GRAIN-LOADING STANDARDS

Fuel Type	Allowable Particulate Emissions	Percent Oxygen
Coal, or the combination of coal and natural gas	$0.100 * X + 0.011 * Y^1$	8%
Gas only	0.015 gr/dscf	3%

¹ X is the percentage of total heating input derived from the combustion of coal; Y is the percentage of total heating input derived from the combustion of natural gas.

When two or more types of fuel are burned concurrently, the allowable emission shall be determined by proportioning the gross heat input and emission standards for each fuel.

[Permit Condition]

- 3.2 The permittee shall monitor and record the boiler fuel type whenever the fuel type is changed. The records shall be maintained in accordance with Permit Condition 1.11. Fuel type in this section means natural gas only, coal only, or the combination of natural gas and coal.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 3.3 The permittee shall comply with the visible emissions requirements listed in Permit Condition 1.7.

[Permit Condition]

- 3.4 The permittee shall operate the scrubber within the specified operating range for each operating parameter specified below.

- The water flow rate to the scrubber shall be maintained within the range from 660 to 990 gpm.
- The concentration of suspended particulate and TDS in the recirculated water shall not exceed 57,900 mg/l of water.

**[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94;
IDAPA 58.01.01.322.08, 4/5/00]**

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- 3.5 The permittee shall, at all times, maintain and operate the multiclone and scrubber in accordance with the O&M manual, or as efficiently as practicable. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Compliance Testing

- 3.6 A compliance test shall be conducted within the first 12 months of this permit term to demonstrate compliance with Permit Condition 3.1. Testing shall be conducted in accordance with IDAPA 58.01.01.157, Permit Condition 1.20, and the following:
- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5B, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157. Test methods and procedures shall comply with IDAPA 58.01.01.157.
 - Prior to conducting the test, the permittee shall address the required averaging period specified in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.
 - A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
 - The permittee shall monitor and record the steam production rate of the boiler, coal feed rate in tons per hour, pressure drop across the multiclone, and water flow rate to the scrubber during each test.
 - For the coal used during the source test, the permittee shall record the coal's highest heating value and coal's analysis result, including ash content.
 - If the PM measured in the initial compliance test is less than or equal to 75% of the emission standards in Permit Condition 3.1, no further testing shall be required during this term of the permit. If the PM measured during the initial compliance test is greater than 75%, but less than or equal to 90%, of the emission standards in Permit Condition 3.1, a second test shall be required in the third year of the permit term. If the PM measured during the initial compliance test is greater than 90% of the emission standards in Permit Condition 3.1, the permittee shall conduct a compliance test annually.
 - The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of suspended particulate and TDS of the sample recirculated water shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.
 - The permittee shall record and maintain the information required under Permit Condition 3.6 in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 09, 5/1/94;
IDAPA 58.01.01.322.08, 4/5/00]

- 3.7 The permittee may conduct additional compliance tests during the permit term to revise the operational parameters in Permit Condition 3.4 and/or parameters developed under Permit Conditions 3.6, so long as the compliance tests conform to all requirements of this permit.

[IDAPA 58.01.01.322.01, 3/19/99]

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Monitoring and Recordkeeping

- 3.8 When combusting coal only, or any combination of coal and natural gas, the permittee shall conduct weekly visible emissions inspections during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for the boiler stack(s). If any visible emissions are present, the permittee shall perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.
- During a week that a compliance test required by Permit Condition 3.6 is scheduled, the weekly visible emissions evaluation shall be performed during the compliance test. Results of the visible emissions evaluation shall be submitted with the compliance test report.
 - If four consecutive weekly visible emissions inspections indicate that visible emissions are not present, or opacity is below 20%, respectively, the frequency of visible emissions inspections decreases to monthly. If any monthly Method 9 observation indicates opacity is greater than 20%, the frequency of the visible emissions inspections reverts to weekly.
[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]
- 3.9 The permittee shall install, operate, calibrate, and maintain monitoring devices to continuously measure the scrubber water flow rate. This operating parameter shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event the monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.
[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94;
IDAPA 58.01.01.322.08, 4/5/00]
- 3.10 At least once each year during a planned maintenance outage, or as needed during operation, the multiclone and the spray-chamber scrubber shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the multiclone and the scrubbers to ensure efficient operation.
[IDAPA 58.01.01.322.01 (state-only), 3/19/99]
- 3.11 The permittee shall collect a representative sample of recirculated water from the scrubber monthly from September to December and biweekly from January to the end of the campaign. The concentration of suspended particulate and TDS in the sample recirculated water shall be analyzed and recorded.
[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94;
IDAPA 58.01.01.322.08, 4/5/00]
- 3.12 All the records shall be recorded and maintained in accordance with Permit Condition 1.11. The permittee shall record the starting and ending dates of each campaign.
[IDAPA 58.01.01.322.06, 07, 5/1/94]

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4. PULP DRYING (P-D1A, P-D1B, P-D2A, P-D2B)

The following is a narrative description of the pulp dryers regulated in this Tier I operating permit. This description is for informational purposes only.

Emissions Unit Group 3 consists of the South pulp dryer and North pulp dryer. These are two direct-fired pulp dryers are used to dry pressed beet pulp. The two dryers are primarily coal-fired. Exhaust gasses from each dryer split into two streams. Each stream passes through a cyclone and a spray-impingement-type scrubber in series.

Table 4.1 describes the control devices used in controlling emissions from the pulp dryers.

Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point Identification	Emissions Unit(s) / Process(es)	Emission Control Device
P-D1A	48.5 tons per hour process weight input rate south pulp dryer (S-D1)	A pair of cyclones (A - D1A) operated in parallel and then exhausted to a pair of spray-impingement-type scrubbers (A - D1B) operated in parallel
P-D1B		
P-D2A	56.9 tons per hour process weight input rate north pulp dryer (S-D2)	A pair of cyclones (A - D2A) operated in parallel and then exhausted to a pair of spray-impingement-type scrubbers (A - D2B) operated in parallel
P-D2B		

The following table contains a summary of requirements that generally apply to the pulp dryers. Specific permit requirements are listed below Table 4.2.

TABLE 4. 2 APPLICABLE REQUIREMENTS SUMMARY FOR PULP DRYERS

Permit Conditions	Affected Emissions Unit	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
4.1	Each scrubber of each dryer	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; Permit No. 1020-0001	4.7, 4.11
4.2	South pulp dryer	PM	Process weight	IDAPA 58.01.01.703	4.5, 4.8, 4.11
	North pulp dryer				

Table 4.3 contains a summary of requirements that apply to each dryer's scrubber. Specific permit requirements are listed below.

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Table 4.3 APPLICABLE REQUIREMENTS SUMMARY FOR CONTROL DEVICES

Control Device	Operating Parameter	Operating Range	Monitoring and Recording Requirements
Each scrubber	Pressure drop	4" of water column or greater	4.9, 4.11
	Water flow	100 to 400 gpm	
	Concentration of TDS and suspended particulate in the scrubber's recirculated water	57,900 mg/l	4.10, 4.11

Permit Limits/Operating Requirements

4.1 The permittee shall comply with visible emissions requirements specified in Permit Condition 1.7.
[Permit Condition]

4.2 No person with process exempt under IDAPA 58.01.01.702.02.b shall emit particulate matter to the atmosphere from any process or process equipment in excess of the amount shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour, and PW is the process weight rate in pounds per hour. The averaging period for this limit is one hour in accordance with IDAPA 58.01.01.700.03.

a. If PW is less than 60,000 lb/hr,

$$E = 0.02518(PW)^{0.67}$$

b. If PW is greater than or equal to 60,000 lb/hr,

$$E = 23.84(PW)^{0.11} - 40$$

[Permit Condition]

4.3 The permittee shall operate each scrubber within the specified operating range for each control device operating parameter specified below.

- The water flow of each scrubber shall be maintained within the range from 100 to 400 gpm.
- The pressure drop across each scrubber shall be maintained at 4 inches of water column or greater.
- The concentration of suspended particulate and TDS in the recirculated water shall not exceed 57,900 mg/l of water.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94;
IDAPA 58.01.01.322.08, 4/5/00]

4.4 The permittee shall, at all times, maintain and operate the cyclones and scrubbers in accordance with the O&M manual, or as efficiently as practicable. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Compliance Testing

4.5 A compliance test shall be conducted within the first 12 months of this permit term to demonstrate compliance with Permit Conditions 4.1 and 4.2. Testing shall be conducted in accordance with IDAPA 58.01.01.157, Permit Condition 1.20, and the following:

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- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157. Test methods and procedures shall comply with IDAPA 58.01.01.157.
- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- For each pulp dryer, the process weight input (tons per hour) shall be calculated using the methodology described in Appendix A of this permit, *Pulp Dryer Material Input Rate Calculation*, or as otherwise approved in writing by DEQ. Parameters and operating data used to calculate the process weight input must also be recorded for each compliance test run. These parameters and operating data include total dried pulp produced (tons per day), dried pulp moisture content (percent by weight), pressed pulp moisture content (percent by weight), fuel heating value (Btu/lb), fuel input per ton of dried pulp (therms per ton), quantity of additives (percent of dry substance per ton of dry pulp), solids content of the additives, and throughput to each dryer (percent).
- The permittee shall collect a representative sample of recirculated water from the scrubber during each compliance test. The total concentration of total dissolved solids and suspended solids of the recirculated water sample shall be analyzed and recorded and expressed in milligrams of solids per liter of water.
- For each scrubber, the permittee shall record the pressure drop across the scrubber, water flow of the scrubber, and water pressure of sprays.
- If the PM measured during the initial compliance test is less than or equal to 75% of the emission standards in Permit Condition 4.2, no further testing shall be required during this term of this permit. If the PM measured during the initial compliance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 4.2, a second test shall be required in the third year of the permit term. If the PM measured during the initial compliance test is greater than 90% of the emission standard in Permit Condition 4.2, the permittee shall conduct a compliance test annually.
- The permittee shall record and maintain information required under Permit Condition 4.5 in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94;
IDAPA 58.01.01.322.08, 4/5/00]

- 4.6 The permittee may conduct additional compliance tests during the permit term to revise the operational parameters in Permit Condition 4.3 and/or parameters developed under Permit Conditions 4.5, so long as the compliance tests conform to all requirements of this permit.

[IDAPA 58.01.01.322.01, 3/19/99]

Monitoring and Recordkeeping Requirements

- 4.7 The permittee shall conduct weekly visible emissions observations during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for dryer stacks. If any visible emissions are present, the permittee shall perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with

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IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

- During a week that a compliance test required by Permit Condition 4.5 is scheduled, the weekly visible emissions evaluation shall be performed during the compliance test. Results of the visible emissions evaluation shall be submitted with the compliance test report.
- If four consecutive weekly visible emissions inspections indicate that visible emissions are not present, or opacity is below 20%, respectively, the frequency of visible emissions inspections decreases to monthly. If any monthly Method 9 observation indicates opacity is greater than 20%, the frequency of the visible emissions inspections reverts to weekly.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

- 4.8 The permittee shall record the process weight input rate for each dryer monthly. It shall be calculated in accordance with the Pulp Dryer Throughput Calculation Spreadsheet in the appendix of this permit, or as otherwise approved in writing by DEQ.

[Permit Condition]

- 4.9 The permittee shall install, operate, calibrate, and maintain monitoring devices to continuously measure the scrubber water flow rate and pressure drop across the scrubber. The flow rate and pressure drop shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event the monitoring device(s) becomes inoperable, it/they shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

- 4.10 The permittee shall collect a representative sample of recirculated water from the scrubber monthly from September to December and biweekly from January to the end of each campaign. The concentration of suspended particulate and total dissolved solids in the recirculated water sample shall be analyzed and recorded. The result shall be expressed in milligrams of solids per liter of water.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

- 4.11 All the records shall be recorded and maintained in accordance with Permit Condition 1.11. The permittee shall record the starting and ending dates of each campaign.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 4.12 At least once each year during a planned maintenance outage, or as needed during operation, each cyclone and scrubber shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to cyclone(s) and scrubber(s) to ensure efficient operation.

[IDAPA 58.01.01.322.01, 03/19/99]

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5. PELLET COOLING (P-D3, P-D4, P-D5)

The following is a narrative description of the pellet cooling process regulated in this Tier I operating permit. This description is for informational purposes only.

The pellet coolers are all manufactured by California Pellet Mill (model 2GA3). Each pellet cooler is rated at 7.4 T/hr. Emissions from the pellet coolers consist of PM and PM₁₀. The three pellet coolers' emissions are controlled by two cyclones.

Table 5.1 describes the devices used to control emissions from the pellet coolers.

Table 5.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point Identification	Emissions Unit(s)/ Process(es)	Emission Control Device
P-D3	Pellet cooler No. 1 (S-D3)	Cyclone A-D3
P-D4/5	Pellet cooler No. 2 (S-D4)	Cyclone A-D4/5
	Pellet cooler No. 3 (S-D5)	

Table 5.2 contains a summary of requirements that apply generally to pellet coolers. Specific permit requirements are listed below Table 5.2.

Table 5.2 APPLICABLE REQUIREMENTS SUMMARY FOR PELLET COOLER NO.'S 1 AND 2

Permit Conditions	Affected Emissions Unit	Parameter	Permit Limit/Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Each emission point	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11
5.1	Pellet Cooler No. 1, Pellet Cooler No. 2, Pellet Cooler No. 3	PM	Process weight	IDAPA 58.01.01.702	5.2, 5.3

Permit Limits/Operating Requirements

- 5.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

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- 5.2 The permittee shall, at all times, maintain and operate the cyclones in accordance with the O&M manual, or as efficiently as practicable. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Monitoring and Recordkeeping Requirements

- 5.3 At least once each year during a planned maintenance outage, or as needed during operation, each cyclone shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the cyclone(s) to ensure efficient operation.

[IDAPA 58.01.01.322.01, 03/19/99]

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6. LIME KILNS (P-K1/2A, P-K1/2B, P-K1/2C, P-K1/2D, P-K1/2E, P-K1/2F, P-K2B)

The following is a narrative description of the lime kilns regulated in this Tier I operating permit. This description is for informational purposes only.

The gas kiln, manufactured by Union Carbide and rated at 200 tons, was installed prior to 1970. The coke kiln, manufactured by Larowe Construction and is a 100-ton Belgium model, was also installed prior to 1970.

The exhaust gas from the kilns is pulled from the top of the kilns and passes through gas washers and carbonation tanks, or can be routed through a scrubber in specific instances. For permitting purposes, the gas washers and carbonation tanks are considered process equipment, while the scrubber is considered control equipment.

Table 6.1 describes the control devices used in controlling emissions from the lime kilns.

Table 6.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point/Source Identification	Emissions Unit(s) Identification	Emission Control Device
P-K1/2A, P-K1/2B, and P-K1/2C; and/or P-K1/2D, P-K1/2E, and P-K1/2F	362 tons lime rock per day natural gas-fired lime kiln; 0.93 million cubic feet of natural gas per day Gas Kiln (S-K1)	None
P-K1/2A, P-K1/2B, and P-K1/2C;	168 tons lime rock per day coke-fired lime kiln, 12 tons coke per day	None
P-K2B	Coke Kiln (S-K2)	One scrubber (A - K2B) while charging the kiln

Table 6.2 contains a summary of requirements that apply generally to the lime kilns. Specific permit requirements are listed below Table 6.2.

Table 6.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Emission Unit	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Each emission point	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11, 6.4
6.1	Gas kiln	PM	Process weight	IDAPA 58.01.01.702	6.2-6.5
	Coke kiln				

Permit Limits/Operating Requirements

- 6.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

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- a. If PW is less than 17,000 lb/hr,
 $E = 0.045(PW)^{0.60}$
- b. If PW is equal to or greater than 17,000 lb/hr,
 $E = 1.12(PW)^{0.27}$

[IDAPA 58.01.01.702, 4/5/00]

- 6.2 The permittee shall, at all times, maintain and operate the scrubber in accordance with the O&M manual, or as efficiently as practicable. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Monitoring and Recordkeeping Requirements

- 6.3 Within one year of permit issuance, the permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the water pressure on the spray nozzles in the scrubber. After the monitoring device is operable, the water pressure shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event that a monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

- 6.4 Within six months of installation of the scrubber monitoring devices required by Permit Condition 6.3, the permittee shall develop proposed water pressure ranges for the scrubber. The proposal shall be submitted to DEQ as an administrative amendment request, per IDAPA 58.01.01.381, to incorporate the water pressure ranges as an operating limit in the Tier I permit. This proposal shall include monitoring data and any other documentation necessary to substantiate that the proposed water pressure ranges will ensure compliance with Permit Conditions 1.7 and 6.1.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

- 6.5 At least once each year during a planned maintenance outage, or as needed during operation, the scrubber shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the scrubber to ensure efficient operation.

[IDAPA 58.01.01.322.01, 03/19/99]

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7. FLUME SLAKER AND PROCESS SLAKER (P-K3)

The following is a narrative description of the flume slaker and process slaker regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates two lime slakers to produce milk of lime from crushed calcium oxide (CaO) rocks and water. Lime slakers are batch processes, per the application. Slaker emissions are controlled by a common spray-chamber type scrubber.

Table 7.1 describes the control devices used in controlling emissions from the slakers.

Table 7.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point/Source Identification	Emissions Unit(s) Identification	Emissions Unit(s) Identification	Emission Control Device
P-K3	Rated total 367 tons CaO per day	Flume slaker (S-K3)	One spray chamber scrubber
		Process slaker (S-K3)	

Table 7.2 contains a summary of requirements that apply generally to the slakers. Specific permit requirements are listed below Table 7.2.

Table 7.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Emission Unit	Parameter	Permit Limit/Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Flume slaker and process slaker	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11, 7.4
7.1	Flume slaker and process slaker	PM	Process weight rate	IDAPA 58.01.01.701	7.2-7.5

Permit Limits/Operating Requirements

- 7.1 No person shall emit to the atmosphere from any process or process equipment commencing operation on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$
- If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.27}$$

[IDAPA 58.01.01.701, 4/5/00]

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- 7.2 The permittee shall, at all times, maintain and operate the scrubber in accordance with the O&M manual, or as efficiently as practicable. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Monitoring and Recordkeeping Requirements

- 7.3 Within one year of permit issuance, the permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the water pressure on the spray nozzles in the scrubber. After the monitoring device is operable, the water pressure shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event that a monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

- 7.4 Within six months of installation of the scrubber monitoring devices required by Permit Condition 7.3, the permittee shall develop proposed water pressure ranges for the scrubber. The proposal shall be submitted to DEQ as an administrative amendment request, per IDAPA 58.01.01.381, to incorporate the water pressure ranges as an operating limit in the Tier I permit. This proposal shall include monitoring data and any other documentation necessary to substantiate that the proposed water pressure ranges will ensure compliance with Permit Conditions 1.7 and 7.1.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

- 7.5 At least once each year during a planned maintenance outage, or as needed during operation, the scrubber shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the scrubber to ensure efficient operation.

[IDAPA 58.01.01.322.01, 03/19/99]

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8. DRYING GRANULATOR (P-W1)

The following is a narrative description of the drying granulator, identified as emission point P-W1, regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates a drying granulator to dry wet sugar. The drying granulator was manufactured by TASCO and installed prior to 1952. Emissions from the drying granulator are controlled by a dust box type scrubber.

Table 8.1 describes the devices used to control emissions from the drying granulator.

Table 8.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point/Source Identification	Emissions Unit(s) Identification	Emission Control Device
P-W1	65 tons sugar per hour drying granulator (S-W1)	Scrubber (A -W1)

Table 8.2 contains a summary of requirements that apply generally to the drying granulator. Specific permit requirements are listed below Table 8.2.

Table 8.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11, 8.4
8.1	PM	Process weight	IDAPA 58.01.01.702	8.2-8.5

Permit Limits/Operating Requirements

- 8.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- If PW is less than 17,000 lb/hr,
$$E = 0.045(PW)^{0.60}$$
- If PW is equal to or greater than 17,000 lb/hr,
$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

- 8.2 The permittee shall, at all times, maintain and operate the scrubber in accordance with the O&M manual, or as efficiently as practicable. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

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Monitoring and Recordkeeping Requirements

- 8.3 Within one year of permit issuance, the permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the water pressure on the spray nozzles in the scrubber. After the monitoring device is operable, the water pressure shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event that a monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.
[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]
- 8.4 Within six months of installation of the scrubber monitoring devices required by Permit Condition 8.3, the permittee shall develop proposed water pressure ranges for the scrubber. The proposal shall be submitted to DEQ as an administrative amendment request, per IDAPA 58.01.01.381, to incorporate the water pressure ranges as an operating limit in the Tier I permit. This proposal shall include monitoring data and any other documentation necessary to substantiate that the proposed water pressure ranges will ensure compliance with Permit Conditions 1.7 and 8.1.
[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]
- 8.5 At least once each year during a planned maintenance outage, or as needed during operation, the scrubber shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the scrubber to ensure efficient operation.
[IDAPA 58.01.01.322.01, 03/19/99]

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9. COOLING GRANULATORS (P-W2, P-W3)

The following is a narrative description of the cooling granulators regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates two cooling granulators to cool hot sugar from the drying granulator. Each cooling granulator is rated at 65T/hr. Emissions from the cooling granulators are controlled by baghouses.

Table 9.1 describes the devices used to control emissions from the cooling granulators.

Table 9.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point/Source Identification	Emissions Unit(s) Identification	Emission Control Device
P-W2	Cooling granulator No. 1 (S-W2)	Baghouses (A – W2)
P-W3	Cooling granulator No. 2 (S-W3)	Baghouses (A – W3)

The following table contains a summary of requirements that apply generally to the cooling granulators. Specific permit requirements are listed below Table 9.2.

Table 9.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Emissions Unit	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Cooling granulator No. 1 and cooling granulator No. 2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11, 9.5
9.1, 9.2	Cooling granulator No. 1; Cooling granulator No. 2	PM	Process weight	IDAPA 58.01.01.701; IDAPA 58.01.01.702	9.3-9.6

Permit Limits/Operating Requirements

9.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

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- 9.2 No person shall emit to the atmosphere from any process or process equipment commencing operation on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701 4/5/00]

- 9.3 The permittee shall, at all times, maintain and operate the baghouses in accordance with the O&M manual, or as efficiently as practicable. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Monitoring and Recordkeeping Requirements

- 9.4 Within one year of permit issuance, the permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the pressure drop across the baghouses. After the monitoring device is operable, the pressure drops shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event that a monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

- 9.5 Within six months of installation of the baghouse monitoring devices required by Permit Condition 9.4, the permittee shall develop proposed pressure drop ranges for the baghouses. The proposal shall be submitted to DEQ as an administrative amendment request, per IDAPA 58.01.01.381, to incorporate the pressure drop ranges as an operating limit in the Tier I permit. This proposal shall include monitoring data and any other documentation necessary to substantiate that the proposed pressure drop ranges will ensure compliance with Permit Conditions 1.7, 9.1, and 9.2.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

- 9.6 At least once each year during a planned maintenance outage, or as needed during operation, the baghouses shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the baghouses to ensure efficient operation.

[IDAPA 58.01.01.322.01, 03/19/99]

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10. SUGAR HANDLING SYSTEM (P-W4, P-W5)

The following is a narrative description of the sugar handling system regulated in this Tier I operating permit. This description is for informational purposes only.

Particulate matter is emitted from process sugar handling and sugar handling bulk loading systems. Emissions are controlled by baghouses.

Table 10.1 describes the devices used to control emissions from the sugar handling system.

Table 10.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point/ Source Identification	Emissions Unit(s) Identification	Emission Control Device
P-W4	Process sugar-handling system with ventilation of 16,600 acfm to baghouses (Process S-W4)	Baghouses (A -W4)
P-W5	Bulk loadout sugar-handling system with ventilation of 17,000 acfm to baghouses (Bulk Loadout S-W5)	Baghouses (A -W5)

Table 10.2 contains a summary of requirements that apply generally to sugar handling. Specific permit requirements are listed below Table 10.2.

Table 10.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Emission Unit/Source	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Baghouse vents	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11, 10.4
10.1	Sugar-handling (Process)	PM	Process weight	IDAPA 58.01.01.702	10.2-10.5
10.1	Sugar-handling (Bulk Loadout)	PM	Process weight	IDAPA 58.01.01.702	10.2-10.5

Permit Limits/Operating Requirements

10.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$
- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

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- 10.2 The permittee shall, at all times, maintain and operate the baghouses in accordance with the O&M manual, or as efficiently as practicable. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Monitoring and Recordkeeping Requirements

- 10.3 Within one year of permit issuance, the permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the pressure drop across the baghouses. After the monitoring device is operable, the pressure drops shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event that a monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

- 10.4 Within six months of installation of the baghouse monitoring devices required by Permit Condition 10.3, the permittee shall develop proposed pressure drop ranges for the baghouses. The proposal shall be submitted to DEQ as an administrative amendment request, per IDAPA 58.01.01.381, to incorporate the pressure drop ranges as an operating limit in the Tier I permit. This proposal shall include monitoring data and any other documentation necessary to substantiate that the proposed pressure drop ranges will ensure compliance with Permit Conditions 1.7 and 10.1.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

- 10.5 At least once each year during a planned maintenance outage, or as needed during operation, the baghouses shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the baghouses to ensure efficient operation.

[IDAPA 58.01.01.322.01, 03/19/99]

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11. LIME KILN BUILDING MATERIAL HANDLING BAGHOUSES

The following is a narrative description of the lime kiln building material handling baghouses regulated in this Tier I operating permit. This description is for informational purposes only.

Particulate matter emissions from the lime kiln building material handling are controlled by four baghouses.

Table 11.1 describes the devices used to control emissions from the lime kiln building.

Table 11.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point/ Source Identification	Emissions Unit(s) Identification	Emission Control Device
None identified	Lime kiln building material handling	Four baghouses

Table 11.2 contains a summary of requirements that apply generally to the four lime kiln building material handling baghouses. Specific permit requirements are listed below Table 11.2.

Table 11.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Emission Unit	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Each baghouse	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11, 11.4
11.1	All four baghouses	PM	Process weight	IDAPA 58.01.01.702	11.2-11.5

Permit Limits/Operating Requirements

- 11.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$
- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

- 11.2 The permittee shall, at all times, maintain and operate the baghouses in accordance with the O&M manual, or as efficiently as practicable. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

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Monitoring and Recordkeeping Requirements

- 11.3 Within one year of permit issuance, the permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the pressure drop across the baghouses. After the monitoring device is operable, the pressure drops shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event that a monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.
[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]
- 11.4 Within six months of installation of the baghouse monitoring devices required by Permit Condition 11.3, the permittee shall develop proposed pressure drop ranges for the baghouses. The proposal shall be submitted to DEQ as an administrative amendment request, per IDAPA 58.01.01.381, to incorporate the pressure drop ranges as an operating limit in the Tier I permit. This proposal shall include monitoring data and any other documentation necessary to substantiate that the proposed pressure drop ranges will ensure compliance with Permit Conditions 1.7 and 11.1.
[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]
- 11.5 At least once each year during a planned maintenance outage, or as needed during operation, the baghouses shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the baghouses to ensure efficient operation.
[IDAPA 58.01.01.322.01, 03/19/99]

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12. NON-APPLICABILITY DETERMINATION

- 12.1 The standards for fuel-burning equipment particulate matter, IDAPA 58.01.01.675 do not apply to pulp dryers, which are included under Section 4 of this permit, or lime kilns which are included under Section 6 of this permit.
- 12.2 The grain-loading standard (0.1 gr/dscf) in Section 1.1 of the existing Permit No. 1020-0001 dated January 1, 1984, does not apply to pulp dryers under Section 4 of this permit.
- 12.3 Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D, does not currently apply to the B & W boiler.
- 12.4 Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D, does not currently apply to the Erie City boiler.
- 12.5 Permit Conditions 2.1, 2.2, 3.1, 3.2, 3.3, 3.4, 4.1, 4.2, 4.3, and 4.4 of existing Permit No. 1020-0001, dated January 1, 1984, are no longer applicable because they pertain to the 1984 through 1986 campaign seasons which have been completed.

[IDAPA 58.01.01.325, 5/1/94]

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COMPLIANCE SCHEDULE

TASCO shall implement the following compliance schedule to assure compliance with the applicable requirements in the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.01, et seq. The permittee shall obtain a combined facility-wide Tier II operating permit and PTC (hereafter referred to as the facility-wide permit) and a modified Tier I operating permit. The specific elements of the compliance schedule

Table 13.1 COMPLIANCE SCHEDULE

Permit Conditions	Milestone	Deadline	Documentation / Reporting
13.2	Submit complete facility-wide permit application to comply with IDAPA 58.01.01.400 through 410	180 days after issuance of the Tier I operating permit	Completeness letter from DEQ
13.3	Concurrently submit complete application information to address the applicable PTC requirements in IDAPA 58.01.01.200 through 223 for those sources for which the permittee may have been required to, but did not obtain, a PTC	180 days after issuance of the Tier I operating permit	Completeness letter from DEQ
13.4	Submit supplemental application information to address the applicable PTC requirements for any additional sources identified	Within 30 days of a request in writing by DEQ during processing of the facility-wide permit	Completeness letter from DEQ
13.7	Submit a request to modify the Tier I operating permit	30 days after the facility-wide permit application is found complete	Completeness letter from DEQ
13.8	Submit quarterly progress reports	January 1, April 1, July 1, and October 1 of each year	

- 13.1 DEQ identified the following sources as sources that may have been required to, but did not obtain, a PTC prior to construction and/or modification:
- The third, fourth, and fifth evaporators replaced prior to the 2001 beet campaign
 - The permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.
- 13.2 TASCO shall submit a complete permit application and all additional information requested by DEQ for issuance of a facility-wide Tier II operating permit within 180 days of issuance of this Tier I operating permit. The application shall address the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410.
- [IDAPA 58.01.01.322.10, 4/5/00]**
- 13.3 In addition to the requirements for Tier II operating permits, the facility-wide permit application shall include all of the applicable information and address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through IDAPA 58.01.01.223 for the construction and/or modification of sources for which the permittee may have been required to, but did not obtain, a PTC. DEQ has identified some specific sources in Permit Condition 13.1 as sources that may have required a PTC prior to construction or modification.
- [IDAPA 58.01.01.322.10, 4/5/00]**

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- 13.4 If through the development of the facility-wide permit, it is determined that the facility should have obtained a PTC or a PTC modification for any other source or sources at the facility, the permittee shall submit a supplemental application that addresses the applicable requirements for PTCs within 30 days of receiving written notification from DEQ.
[IDAPA 58.01.01.322.10, 4/5/00]
- 13.5 The application submittal deadlines set forth in the compliance schedule may be extended if the permittee clearly demonstrates that additional time is needed to collect new data for submittal of a complete application. Extension requests, with complete information to justify the request, must be submitted in writing to DEQ no later than the midpoint of the milestone timeline. The deadlines may be extended for up to one year through written authorization from DEQ.
[IDAPA 58.01.01.322.10, 4/5/00]
- 13.6 Upon receipt of a complete application, DEQ will draft a single proposed facility-wide permit for the facility. The permit will contain all of the terms and conditions necessary to comply with the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 and the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410. The permit will clearly identify the origin and basis for each term and condition. The procedures for issuing a PTC under IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II operating permit under IDAPA 58.01.01.404.
[IDAPA 58.01.01.322.10, 4/5/00]
- 13.7 TASCO shall request a modification to their Tier I operating permit within 30 days after the combined facility-wide Tier II operating permit and PTC application is determined complete by DEQ. The Tier I operating permit shall be modified to incorporate all applicable requirements of the facility-wide permit and shall be issued concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I permit in IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.10, 4/5/00]
- 13.8 Until such time that a modified Tier I operating permit is issued pursuant to Permit Condition 13.7, TASCO shall submit a progress report each calendar quarter to DEQ stating when each of the milestones and compliance with each condition in the compliance schedule were or will be achieved, and an explanation of why any dates were not or will not be met and a detailed description of any preventative or corrective measures undertaken by the permittee.
[IDAPA 58.01.01.322.10, 4/5/00]
- 13.9 This schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.
[IDAPA 58.01.01.322.10, 4/5/00]

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14. TIER I OPERATING PERMIT GENERAL PROVISIONS***General Compliance***

- 14.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(I)]
- 14.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(II)]
- 14.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

- 14.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1)(2); 40 CFR 70.6(a)(6)(III)]
- 14.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(III)]

Property Rights

- 14.6 This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(IV)]

Information Requests

- 14.7 The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]
- 14.8 Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

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Severability

- 14.9 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

- 14.10 The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 228. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-228, 4/6/05; IDAPA 58.01.01.322.15.i, 3/19/99;
IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12)(14)(15); 40 CFR 70.7(d)(e);]

- 14.11 Changes not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 USC Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Section 502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/5/00;
40 CFR 70.4(b)(14)(15)]

Federal and State Enforceability

- 14.12 Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1)(2)]

- 14.13 Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements, or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

Inspection and Entry

- 14.14 Upon presentation of credentials, the permittee shall allow DEQ, or an authorized representative of DEQ, to do the following:

- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

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- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

- 14.15 The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94;
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

- 14.16 The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n, 7/1/02; 40 CFR 70.6(a)(7)]

Certification

- 14.17 All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

- 14.18 a. The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

- 14.19 Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or

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- i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
 - b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
 - c. Nothing in this permit shall alter or affect the following:
 - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to, or at the time, of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 USC Section 7651(g)(a); and
 - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.
- [Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 5/1/94; IDAPA 58.01.01.325, 3/19/99; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]**

Compliance Schedule and Progress Reports

- 14.20
- a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
 - b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
 - c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
 - d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.
- [IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3)(4)]**

Periodic Compliance Certification

- 14.21
- a. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
 - b. Compliance certifications for all emissions units shall be submitted annually, in accordance with the dates specified in Permit Condition 1.10, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ;

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- c. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- d. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
 - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
 - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 14.21.d.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
 - iv. Such other facts as DEQ may require to determine the compliance status of the source.
 - v. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

**[IDAPA 58.01.01.322.11, 4/5/00; 40 CFR 70.6(c)(5)(III) as amended,
62 Fed. Reg. 54900, 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]**

False Statements

- 14.22 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

- 14.23 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

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Location:	MiniCassia Facility		Date Expires:	December 12, 2006

Semiannual Monitoring Reports

- 14.24 In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months, in accordance with the dates specified in Permit Condition 1.10. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

- 14.25 The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

- 14.26 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

- 14.27 In accordance with IDAPA 58.01.01.332, an emergency as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

APPENDIX A

The Amalgamated Sugar Company, Paul Process Weight Input Calculation

Appendix

Pulp Dryer Material Input Rate Calculation

The material input rate is back calculated using the following parameters: tons of dried pulp produced; pressed pulp moisture content (%); dried pulp moisture content (%); fuel input per ton of dried pulp (therms/ton); fuel heating value (BTUs/lb); amount of additives (% dry substance on dried pulp); and solids content of the additives (RDS). This data is inputted into the attached spreadsheet to calculate the material input rate expressed as tons of input per hour. Parameters to calculate the dryer input are collected from the daily reports. The hourly material input rate is calculated by dividing the daily rate by 24. Throughput to each dryer is calculated by either: 1) Measuring the amount of coal inputted into each pulp dryer furnace and calculating the percent input to each dryer; or 2) Assuming the north dryer produces ~ 54% of the dried pulp and the south dryer produces ~ 46% of the dried pulp. This material input rate calculation does not account for any pressed pulp burned in the drum.